

**UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA
SOUTHWESTERN DIVISION**

Richard Brakebill, Deloris Baker, Dorothy
Herman, Della Merrick, Elvis Norquay, Ray
Norquay, and Lucille Vivier, on behalf of
themselves,

Plaintiffs,

vs.

Alvin Jaeger, in his official capacity as the
North Dakota Secretary of State,

Defendants.

Civil No. 1:16-cv-8

Declaration of LaDonna Brave Bull Allard

I, LaDonna Brave Bull Allard, declare as follows:

1. I am an enrolled member of the Standing Rock Sioux Tribe. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to these facts if asked to do so.

2. I was born on June 8, 1956 and I am a U.S. and North Dakota citizen. I have lived in Fort Yates, North Dakota since 1993. I have voted in many elections since I turned 18 years of age and became a qualified voter.

3. In 2014, I ran as a candidate for the North Dakota State Representative for District 31. District 31 encompasses all of the Standing Rock reservation and Sioux County, all of Grant County, and parts of Hettinger County and Morton County.

4. Before I decided to run I was not aware that North Dakota had enacted a voter ID law. It was not until I attended a candidate meeting in early 2014 that I became aware of the new law. The passing of the voter ID law and its new requirements is not public knowledge. There has not been very much media coverage concerning it. When I finally did

see an advertisement about the new law, I thought it was misleading because it stated that Tribal ID's were acceptable voter IDs, but it was unclear that the Tribal ID had to have a physical address on it.

5. After hearing about the new voter ID law, I undertook to ensure my state of North Dakota ID and Tribal ID were up to date. I live in Fort Yates, North Dakota, and had to figure out how to get my new state ID. At the time, I worked at the Standing Rock Tourism department. The nearest Driver's License Site to Fort Yates is in Bismark. That is about 69 miles away. The Driver's License Site is also only open during normal working hours. Thus, I had to arrange to take time off from work to obtain my new state ID. After making the arrangements, I knew it was at least a half of a day trip, and decided to take the whole day off.

6. The day I went to obtain my new state ID, it took me more than an hour to drive one way to the Driver's License Site. Once there, I got lucky and only had to wait in line for about 45 minutes before I was able to get my new ID. In total, I had to spend roughly three hours and travel about 140 miles to obtain my new state ID.

7. The burdens of having to travel 140 miles and taking three hours out of my day (which required me to take a full day off from work) is excessive for me, and I have a car and am able to drive. I had a full time job at the time and thus was able to afford the half a tank of gas it took to make the trip. I also have a residential address in Fort Yates, but I am one of the few. Thus, I was able to put my residential address on my state ID. In all, it cost me about \$35 and a full day's time off from work to obtain my new state ID.

8. Based on my knowledge of the community at Standing Rock and in Fort Yates, I would say that 60 percent of the people living at Standing Rock do not have a residential address. For example, my dad does not have a residential address. Living at Standing Rock is very rural living. The majority of the people living in the Standing Rock area have a P.O. box at the Fort Yates post office because we do not get rural mail delivery to our homes. Thus, many people only have P.O. boxes as their home address.

9. When I went to obtain a state ID, employees at the Driver's License Site said to use GPS coordinates as a home address. At Standing Rock, there are high levels of poverty and many people do not have access to a computer or any other means to obtain GPS coordinates. In addition, I know that many tribal members at Standing Rock, and at Fort Yates in particular, do not have access to transportation or do not have enough money to pay for transportation to be able to travel to the state office to obtain a state ID.

10. After finding out about the new voter ID law in 2014, I also undertook to update my tribal ID because it did not have a physical address on it. This meant traveling to the Bureau of Indian Affairs office in Fort Yates and paying \$4 or \$5 for a new tribal ID. The Federal Bureau of Indian Affairs issues tribal IDs at Standing Rock.

11. Regardless of which ID I obtained, a state ID or a tribal ID, I had to pay money to obtain it. Whether it was my time and gas money to travel to Bismark, or the \$5 for a new tribal ID, I had to pay to obtain an ID.

Executed on June 19, 2016 at Fort Yates N. Dak.

I declare under penalty of perjury that the foregoing is true and correct.


LaDonna Brave Bull Allard

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2016, the document titled “**Declaration of LaDonna Brave Bull Allard**” was electronically filed with the Clerk of Court through ECF, and that ECF will send a Notice of Electronic Filing (“NEF”) to:

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DATED: June 20, 2016

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